

# **Exhibit 73**

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4 IN RE: )  
5 CUSTOMS AND TAX ADMINISTRATION OF )  
6 THE KINGDOM OF DENMARK (SKATTEFOR )  
7 VALTNINGEN) TAX REFUND SCHEME )  
LITIGATION, )

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REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 in shares of foreign companies?

2 MS. RICE: Objection to form. You  
3 can answer. Ron, you can answer.

4 A Yes.

5 Q When was that?

6 A I don't recall. I don't recall  
7 when I learned of that strategy. You asked  
8 me about strategy.

9 I don't recall when I learned of  
10 that strategy.

11 Q Okay. So you had mentioned earlier  
12 setting up pension plans.

13 Is there a time that you learned of  
14 a strategy involving setting up those pension  
15 plans?

16 A Yes.

17 Q And when was that?

18 A I believe it was in June of 2014.

19 Q And how did you become familiar  
20 with that strategy?

21 A Through a very good friend named  
22 John Van Merkenstein.

23 Q And can you just describe how he  
24 introduced you to it?

25 A I mean, unfortunately, my memory

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1 isn't perfect. But I believe he mentioned  
2 that that there -- that there might be an  
3 opportunity or that his group was -- was  
4 working on transactions that involved pension  
5 plans and asked if I had any pension plans.

6 And that's how I was introduced to  
7 him.

8 Q You mentioned his group.

9 Were you referring to a specific  
10 company or organization?

11 A No. John -- John worked with  
12 others. I visited their office several times  
13 about other things before that.

14 Q And who were those individuals you  
15 worked with?

16 A There was a man named Jerome, whose  
17 last name I don't remember. I'm sorry.

18 Q Could that be Jerome Lhote?

19 A It could easily be, I just don't  
20 remember the last name.

21 Q Okay.

22 A There was a man named Rich  
23 Markowitz, I believe, and another person  
24 called Matt Stein or -- Mike Stein or Matt  
25 Stein, I don't remember. I'm sorry.

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1                   I'm not being difficult. I'm  
2                   trying to understand what you're asking me.

3                   Q     No, I understand. So when you  
4                   discussed setting up pension plans with  
5                   Mr. Van Merkenstein, did he say if he would  
6                   also be setting up pension plans at the same  
7                   time?

8                   A     No, he didn't say that.

9                   Q     Did you discuss whether he would be  
10                  making any money from you setting up pension  
11                  plans?

12                  A     I just want to just -- and the  
13                  answer to your question is yes, he said he  
14                  would be making money, but not from me  
15                  setting up pension plans. I didn't set up  
16                  pension plans.

17                  I'm hoping you're hearing me.

18                  Q     I understand.

19                  So -- and the clarification you're  
20                  saying is that the pension plans were set up  
21                  on your behalf.

22                  Is that accurate?

23                  A     That -- I think that's more  
24                  accurate, yes.

25                  Q     If there's a more accurate way,

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1 point about this letter?

2 Q Yes.

3 A The answer is yes. The answer to  
4 that is yes.

5 Q Okay. How did you first interact  
6 with Kaye Scholer?

7 A Okay. Again, you know, I've  
8 been -- I'm sorry to do this to you, but  
9 Kaye Scholer also represented the leveraged  
10 buyout group that I played -- that I was in.  
11 So I did a lot with Kaye Scholer in the '90s.

12 So are you talking about did I ever  
13 do anything with Kaye Scholer, or are you  
14 asking me specifically about these  
15 transactions in the pension plans?

16 Q That's a helpful clarification.

17 Thank you.

18 I'm asking about your first  
19 interaction with Kaye Scholer in connection  
20 with the pension plans.

21 A The first interaction was in either  
22 June or July of 2014.

23 Q How did that interaction come to  
24 be?

25 A Why did I? I'm sorry. How did --

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1 Q Prior to -- what precipitated that  
2 contact?

3 A John Van Merkensteijn introduced  
4 me -- either introduced me or told me to call  
5 a lawyer at Kaye Scholer who -- for these --  
6 for the -- for these -- for these -- for  
7 this -- these transactions.

8 Q What lawyer did he introduce you  
9 to?

10 A As I recall -- sorry.

11 THE WITNESS: Michelle, did you say  
12 something?

13 MS. RICE: No.

14 THE WITNESS: It's hard to -- I'm  
15 hearing you when you don't speak.

16 A He introduced me to -- I think the  
17 first introduction, John, was to Peter Wells.

18 Q Did Mr. Wells assist in setting up  
19 pension plans for you?

20 A Again --

21 Q Actually, let me withdraw that.

22 Did Mr. Wells assist in setting up  
23 pension plans that related to you?

24 MS. RICE: Objection. You can  
25 answer.

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1 A I believe the answer to that is  
2 yes.

3 Q Did you ever --

4 A Actually, I'm sorry, I'm sorry.

5 The answer to that is I don't know about the  
6 setting up of the pension plans.

7 Q Did Mr. Wells assist in any aspect  
8 of the strategy relating to the pension  
9 plans?

10 MS. RICE: Objection. You can  
11 answer.

12 A Mr. Wells -- Mr. Wells instructed  
13 me as to the steps to take at every -- at  
14 every stage.

15 Q At every stage of what?

16 A Of the -- of this -- of the setting  
17 up of -- as you said, a setting up of these  
18 transactions or my role in the transactions.

19 Q Did you ever meet with Mr. Wells?

20 A Yes.

21 Q Do you recall when?

22 A Well, I believe it was in the  
23 summer of 2015.

24 Q Do you recall who was at that  
25 meeting?

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1 A I think so.

2 (Whereupon a discussion was held  
3 off the record.)

4 MR. MCGOEY: Let's take a  
5 ten-minute break.

6 MS. RICE: We're going to be out  
7 entirely and join back in. Will that  
8 work, maybe? Potentially?

9 THE VIDEOGRAPHER: Let go off the  
10 record real quick. The time is  
11 11:20 a.m. and we're going off the  
12 record.

13 (Brief recess taken.)

14 THE VIDEOGRAPHER: Stand by. The  
15 time is 11:33 a.m. and we're back on  
16 record.

17 Q Mr. Altbach, before we went off the  
18 record, we were describing -- you were  
19 describing a meeting in the summer of 2015 at  
20 Kaye Scholer. You testified that you  
21 remembered who was present at that meeting.

22 Can you tell us who was present?

23 A Yeah. As I recall, it was Peter  
24 Wells and I, and there may have been a  
25 younger person there or another lawyer there,

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1 I'm not sure. But yes.

2 Q Do you think potentially one other  
3 attorney?

4 A I'm not sure, but I think so.

5 (Whereupon a discussion was held  
6 off the record.)

7 Q Mr. Altbach, did you sign an  
8 engagement letter with -- you, personally,  
9 sign an engagement letter with Kaye Scholer  
10 at any point?

11 A I don't remember doing that.

12 Q Do you know if you ever personally  
13 retained Kaye Scholer?

14 MS. RICE: Objection.

15 A I don't remember doing that.

16 Q Do you know if any LLC that was  
17 formed in connection with you ever retained  
18 Kaye Scholer?

19 MS. RICE: Objection. You can  
20 answer.

21 A I'm sorry. That, I don't remember.

22 Q And how about the pension plans  
23 that were formed that related to you? Do you  
24 know if they retained Kaye Scholer?

25 MS. RICE: Objection. You can

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1                   And then I certainly did not pay  
2                   Kaye Scholer anything after that. I don't  
3                   know if I had before.

4                   I have no idea.

5                   Q     Understood.

6                   So it's your testimony that LLCs  
7                   were established before they had any  
8                   connection to you?

9                   A     I believe so.

10                  Q     And the pension plans that related  
11                  to you, do you know if they paid any fees to  
12                  Kaye Scholer in 2014 to 2015?

13                  MS. RICE: Objection. You can  
14                  answer.

15                  A     I don't -- I don't know.

16                  Q     Did you have an understanding that  
17                  Kaye Scholer represented you personally in  
18                  2014/2015?

19                  MS. RICE: Hold on. Ron Altbach,  
20                  individually, as a -- personally?

21                  MR. MCGOEY: Yes. I said  
22                  personally.

23                  MS. RICE: Okay. All right. You  
24                  can answer.

25                  A     I don't think so.

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1 Q Did you have an understanding that  
2 Kaye Scholer represented the LLCs that became  
3 affiliated with you?

4 A Again, I don't -- I'm not sure.

5 Q Did you have an understanding that  
6 Kaye Scholer represented the pension plans  
7 that were affiliated with you?

8 A Kaye Scholer, the firm? I  
9 believe -- I believe so, yeah.

10 Q You believe they represented the  
11 pension plans?

12 A I believe so, yes.

13 Q At the meeting that you attended in  
14 the summer of 2015, that Peter Wells was  
15 present for, and potentially one other  
16 attorney, do you remember what was discussed?

17 A As I recall, I signed power of  
18 attorney, maybe. I signed a bunch of  
19 signature pages that they gave me.

20 Q Okay.

21 A I believe that happened in that  
22 meeting.

23 Q Was there any discussion of why the  
24 power of attorney was being signed?

25 A I don't recall that, no.

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1 Q Did you discuss the  
2 establishment -- withdrawn.

3 Did you discuss LLCs at that  
4 meeting?

5 A I don't remember that we did.

6 Q Did you discuss pension plans at  
7 that meeting?

8 A I can only imagine that we did.  
9 But I don't recall exact -- the exact subject  
10 of the meeting.

11 Q Do you have any recollection of  
12 discussion about any activities your pension  
13 plans would be engaged in once they were set  
14 up?

15 A No, I do not.

16 Q Is there anything else you remember  
17 about that meeting?

18 MS. RICE: Objection. You can  
19 answer.

20 A I'm not sure. So the answer is I'm  
21 not sure what was discussed at that meeting.

22 Q Okay. Do you recall attending any  
23 other meetings at Kaye Scholer?

24 A Can I ask you a question? You mean  
25 about -- about --

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1 Q Yes, thank you. That's a good  
2 clarification.

3 Do you recall any other meetings at  
4 Kaye Scholer in 2014 to 2015?

5 A Yes, I do.

6 Q Okay. When were those other  
7 meetings or meeting?

8 A I'm an old guy. You're asking  
9 me --

10 Q To the best of your recollection?

11 A Can I just help you a little bit  
12 here? Because my wife's in the hospital  
13 today and I don't want this to go until  
14 10<sup>~</sup>o'clock tonight.

15 I have -- there were other subjects  
16 discussed with Kaye Scholer aside from these  
17 pension plans at various points -- other  
18 business stuff. I'm sorry.

19 But you're asking me about --  
20 specifically about this pension plans, right?  
21 And I don't recall the dates of the meetings.

22 Q Okay. You don't remember generally  
23 when these meetings occurred?

24 And if there were meetings that did  
25 not relate to the pension plans or any

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1 activities that the pension plans engaged in,  
2 you know, you don't have to describe those.

3 A Okay. Thank you.

4 Q So you don't generally recall when  
5 any other meetings took place?

6 A No, no, and the -- no, I don't.

7 Q Okay. Do you remember what was  
8 discussed at any other meetings?

9 A Again, I can help here a little  
10 bit --

11 MS. RICE: Hold on. Hold on.

12 These are meetings with lawyers. You  
13 cannot help him here.

14 A The meetings took places only to  
15 sign signature pages on some documents. I  
16 don't remember which documents, and they  
17 weren't with the senior lawyer.

18 It was usually with some -- just --  
19 it was easy for me to stop by and then easier  
20 for me to do that than to go to the post  
21 office and mail signature pages.

22 Q You referenced a senior lawyer.

23 Who was that?

24 A Peter Wells.

25 Q Did you deal with an attorney named

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1 Michael Ben-Jacob at Kaye Scholer at any  
2 point?

3 A Excuse me, but you clarified  
4 earlier that you're talking about -- these  
5 questions are -- only have to do with the  
6 pension plans and these transactions.

7 Right?

8 Q Yes.

9 A No, I did not deal with him in  
10 person.

11 Q Okay. And stepping outside of  
12 matters relating to these pension plans, did  
13 you deal with Michael Ben-Jacob on other  
14 matters?

15 A Once, a little bit later, yes.

16 Q And that -- as far as you know,  
17 that matter is unrelated to this litigation?

18 A I do know and it's completely  
19 unrelated, yes.

20 Q Okay. So is it accurate to say  
21 that any meeting you had with Kaye Scholer  
22 attorneys in connection with this litigation,  
23 there was no discussion on what activities  
24 the pension plans would undertake?

25 A I think that's accurate. I believe

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1 that's accurate.

2 Q Okay. Why don't we look at a  
3 document? So you should have two binders.

4 A I see them.

5 Q I promise we won't look at every  
6 document in this binder.

7 If you could turn to Exhibit 961,  
8 please, in the first binder?

9 MR. MCGOEY: And Mike, that's Bates  
10 number RA 566.

11 (Whereupon the above mentioned was  
12 marked for Identification.)

13 MS. RICE: What exhibit? I'm  
14 sorry, John?

15 MR. MCGOEY: This is -- I'm sorry,  
16 961.

17 MS. RICE: 961.

18 Q And just let me know when you've  
19 had a chance to read that.

20 A (Witness reviewing.)

21 Okay.

22 Q So in the e-mail on the bottom of  
23 this chain, you send Mr. Van Merkensteijn  
24 your address, date of birth, and some other  
25 personal info, and tell him that he already

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1 A No idea? No idea? I may have had  
2 a vague idea, so that may not be correct.

3 Q Okay. Can you describe that vague  
4 idea?

5 A I can.

6 Q Please do so.

7 A The vague idea is that there would  
8 be some kind of trading of securities.

9 Q Okay. Why don't we turn to  
10 Exhibit 965?

11 MR. MCGOEY: Mike, that's Bates  
12 MBJ 5107.

13 (Whereupon the above mentioned was  
14 marked for Identification.)

15 A Okay.

16 Q You had mentioned signing a power  
17 of attorney at Kaye Scholer.

18 Do you recall if this is the  
19 document?

20 A I don't recall that this is the  
21 document signed at Kaye Scholer. But I can  
22 read and see that I signed this document, so.

23 Q Okay. The notarization is dated  
24 July 23, 2014.

25 Is that -- is that the time period

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1 you think you would have attended a meeting  
2 at Kaye Scholer?

3 A Again, I think I'm not a hundred  
4 percent sure, but that seems to be  
5 reasonable. I think it's possible, yes.

6 Q Okay. So this power of attorney  
7 specifically empowers Michael Ben-Jacob as  
8 your agent.

9 A Is that correct?

10 A That's what it is, yes.

11 Q Okay. You testified that you did  
12 not meet with Mr. Ben-Jacob in connection  
13 with this opportunity.

14 A Does this refresh your recollection  
15 that -- actually, let me withdraw that.

16 A Do you know if Mr. Ben-Jacob was  
17 involved in this pension plan opportunity at  
18 all?

19 A Do I know whether he was involved  
20 in it?

21 Q Yes.

22 A Well, I don't know -- I'm not sure  
23 how to answer that. I mean, he -- I signed a  
24 power of attorney for him to act on behalf of  
25 me. I guess I signed it. Interestingly

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1 answer to that is -- I believe the answer to  
2 that is yes.

3 Q Okay. And what was that  
4 understanding?

5 A That -- my understanding was that  
6 Kaye Scholer would -- would basically handle  
7 all -- all details, all documents, all  
8 relevant issues on behalf of the plans.

9 Q Okay. You mentioned relevant  
10 issues.

11 What would those potentially be?

12 A The setting up of bank accounts.

13 Q Anything else?

14 A That was the first relevant issue  
15 because they -- that was the first relevant  
16 issue.

17 Q Was that because that was the first  
18 thing that needed to happen?

19 A Yes.

20 Q What was going to happen after  
21 those bank accounts were set up?

22 A That, I don't actually know.

23 Q Do you remember anything that was  
24 supposed to occur after the bank accounts  
25 were set up?

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1           A    From time to time, documents needed  
2        to be signed, and they were prepared by  
3        Kaye Scholer. And I was given signature  
4        pages, usually separate from the documents,  
5        to sign.

6           Q    Whose idea was it to just provide  
7        you signature pages?

8               MS. RICE: Objection.

9           A    I have no idea. I don't know.

10          Q    You didn't specifically request  
11        that?

12          A    No.

13          Q    Okay. The first paragraph of this  
14        document --

15          A    Uh-huh.

16          Q    -- it states, "Ronald Altbach" --  
17        it lists your address -- "intends to, either  
18        directly or indirectly, through entities  
19        beneficially owned by him or established by  
20        him, including one or more limited liability  
21        companies and related qualified pension plans  
22        through Section 401(k) of the Internal  
23        Revenue Code in 1986, enter into agreements  
24        to purchase stock."

25               Did you understand that to be part

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1 question?

2 Q Yes.

3 A You're correct.

4 Q Did you become affiliated with this  
5 LLC?

6 A Yes.

7 Q How so?

8 A How soon?

9 Q How so?

10 A Is that the -- is the second word  
11 S-0? I'm sorry.

12 Q I'm sorry. Yes.

13 How so?

14 A I -- at some point, I became the  
15 sole -- no, I'm sorry. I became a member of  
16 the LLC.

17 I shouldn't say "sole" because I  
18 don't know that I was. But I became a member  
19 of the LLC.

20 Q Do you have an understanding of  
21 what it means to be a member of an LLC?

22 A Yes, yes.

23 Q What is that?

24 MS. RICE: Objection to the extent  
25 you're asking for some sort of a legal

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1 understanding. You know, in his  
2 layperson understanding, he can testify.

3 A My understanding is -- my  
4 understanding is it's just like being a  
5 shareholder in a corporation.

6 Q How did you become a member of this  
7 LLC?

8 A That's an interesting question. I  
9 don't recall.

10 I don't recall the process.

11 Q Do you recall how you learned that  
12 you were a member of this LLC?

13 A Again, I'm not -- I'm not trying to  
14 mock you, but I -- I recall how I became a  
15 member, yes.

16 Q Okay. Can you describe that?

17 A I signed -- I signed a document  
18 saying that I was a member. That's how I  
19 became a member, I think.

20 Q Okay. And that was a document  
21 provided by Kaye Scholer?

22 A I believe so, yes.

23 Q To your knowledge, did this LLC  
24 conduct any business?

25 A Are you asking before -- what time

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1 know the timing, if it was after the  
2 litigation or before, but it was around that  
3 time, I guess, in 2016, '17.

4 Q Okay. Yes.

5 In 2014 or 2015, were you aware of  
6 your plan's submitting any claims?

7 MS. RICE: To the Danish taxing  
8 authority, correct?

9 MR. MCGOEY: Yes.

10 A No, I don't believe so. I never  
11 saw such a claim, as an example. Never saw  
12 it.

13 Q Let me -- I'm going to ask you to  
14 turn to Exhibit 1033?

15 MR. MCGOEY: Mark this as 1033.

16 (Whereupon the above mentioned was  
17 marked for Identification.)

18 A Okay.

19 Q So this is one of the claims I was  
20 just referring to and just want to confirm.

21 As far as you knew, you did not  
22 review this prior to it being submitted to  
23 the Danish government?

24 A I definitely did not.

25 Q Okay. If you could flip to the

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1 next exhibit, and to the first two exhibits  
2 in the next binder, and confirm that that's  
3 also the case for those two claims?

4 MR. MCGOEY: So this is Exhibits  
5 1034, 1035, and 1036.

6 (Whereupon the above mentioned was  
7 marked for Identification.)

8 MS. RICE: All in the same binder,  
9 Ron.

10 Q They're actually -- so I think the  
11 latter two are the start of the next binder.

12 A Yeah, no, I understand.

13 MS. RICE: Okay.

14 A But you're asking about basically  
15 the first page of each, which is -- right?

16 Q Well, just if you -- if you think  
17 you reviewed any part of these documents  
18 before they were submitted to the Danish  
19 government.

20 A No, I did not. I definitely did  
21 not.

22 Q Did you become aware, at any point,  
23 of the pension plans receiving payments from  
24 the Danish government? And again, I'm asking  
25 in 2014 and 2015?

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1 A No -- well, no, I didn't -- I did  
2 not know that they -- the payments came from  
3 the Danish government, no.

4 Q Okay. Did you become aware in 2014  
5 or '15 of the plans receiving some sort of  
6 payment?

7 A Yes. In 2015, not 2014.

8 Q Okay. And do you remember when in  
9 2015 that was?

10 A I don't remember exactly, but I  
11 think -- I think the first -- I think the  
12 first such payment was around June of 2015.  
13 I believe.

14 I'm not sure that I'm correctly  
15 recollecting, but that's what I think  
16 happened.

17 Q Okay. And how did you learn that?

18 A Well, money came into my -- into  
19 the plan's bank account.

20 Q Okay. Were you -- did you receive  
21 some notification from the bank or were you  
22 checking the balance?

23 A I was checking the balance. Like a  
24 hawk.

25 Q Okay. So speaking of banking

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1 accounts, did you, at any point, open up bank  
2 accounts for the LLCs?

3 MS. RICE: Objection.

4 Q You can answer.

5 MS. RICE: You can answer, yeah.

6 A So each of the five LLCs opened a  
7 bank account, yes.

8 Q Okay. When you used -- I  
9 noticed --

10 MS. RICE: Excuse me.

11 MR. MCGOEY: Bless you.

12 Q I notice you used the passive voice  
13 there.

14 So do you know who opened up those  
15 bank accounts?

16 A Well, the bank account was  
17 opened -- the LLC opened the bank account. I  
18 was the manager of the LLCs, and the -- so  
19 the answer is, that's the answer.

20 Q Okay. Did you direct the opening  
21 of those accounts?

22 A Kaye Scholer directed the opening  
23 of those accounts and identified the banker  
24 who would open the accounts.

25 Q Were you aware of their being

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1       opened at that time?

2           A    Sure, because I -- yes, the answer  
3       is yes. Because they had to be opened with  
4       money and I had to put the hundred dollars in  
5       each account.

6           Q    Okay.

7           A    On behalf of each of the -- of the  
8       LLCs.

9           Q    Is it fair to say that you  
10       authorized the opening of those accounts?

11          A    Yeah, I think that would be fair.

12          Q    Okay. Why don't we -- let's turn  
13       to Exhibit 1058.

14           MR. MCGOEY: Mark this as 1058.

15           THE WITNESS: 1058?

16           MR. MCGOEY: Yes.

17           MS. RICE: So the second binder.

18           MR. MCGOEY: Correct.

19           (Whereupon the above mentioned was  
20       marked for Identification.)

21           MR. MCGOEY: And Mike, that's  
22       Bates RA 552.

23          A    Okay. I got it.

24          Q    So this is an e-mail exchange  
25       between you and Mr. Van Merkenstein from

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1 the LLC bank accounts on behalf of the LLCs.

2 Q Did you ultimately -- let me  
3 withdraw that.

4 Were bank accounts for the LLCs  
5 ultimately opened at Wells Fargo?

6 A Yes.

7 Q Were bank accounts for the plans  
8 ultimately opened at Wells Fargo?

9 A Yes.

10 Q Did you also authorize the opening  
11 of those accounts?

12 A Yes, as trustee.

13 Q Can you turn to -- actually, I  
14 apologize. This won't happen often, but we  
15 have to go back to the first binder briefly.

16 A Okay.

17 Q Exhibit 596, which has been  
18 previously admitted, previously marked?

19 A 596?

20 Q Yes.

21 A Okay.

22 Q So the bottom e-mail in this chain  
23 is from Mr. Van Merkenstein to Richard  
24 Markowitz, Robert Klugman, and it looks like  
25 also he cc'd himself.